



further the interests of judicial economy and conservation of resources. These parties would report back to the Court within 180 days either to (1) alert the Court that issues of personal jurisdiction and venue have been resolved as to the Stipulating Defendants; or (2) if not resolved in whole or in part, propose a briefing schedule for the Court to resolve any motions concerning personal jurisdiction and venue that any of the Stipulating Defendants intend to file.

For these reasons, Plaintiffs' Liaison Counsel respectfully request that the Court enter the Stipulation and [Proposed] Order attached hereto, which has been executed by Plaintiffs' Liaison Counsel and the Stipulating Defendants.<sup>2</sup> Plaintiffs' Counsel have conferred with the Stipulating Defendants, who consent to the relief requested in this Motion.

Dated: July 6, 2023

/s/ Tricia R. Herzfeld

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<sup>2</sup> As noted therein, entry of this Stipulation and [Proposed] Order does not affect – and is without prejudice to – the right, ability, and intention of any non-Stipulating Defendants to file a motion to dismiss for lack of personal jurisdiction as to any of the consolidated actions on July 7, 2023, or to any action not yet filed or transferred to the MDL proceedings as of today's date.

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### **CERTIFICATE OF SERVICE**

I hereby certify that on July 6, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ Tricia R. Herzfeld

Tricia R. Herzfeld